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OMB No. 2060-0336, Expires 11/30/2022

Federal Operating Permit Program (40 CFR Part 71)  
**6-MONTH MONITORING REPORT (SIXMON)**

**Section A (General Information)**

Permit No. R10T5020100

Reporting Period: Beg. 07 / 01 / 2020 End. 12 / 31 / 2020

Source / Company Name Stimson Lumber Company – Plummer Operation

Mailing Address: Street or P.O. Box P.O. Box 639

City Plummer State ID ZIP 83851 - 0639

Contact person Kevin Crider Title Plant Manager

Telephone ( 208 ) 686 - 9080 Ext. \_\_\_\_\_

Continued on next page

**Section B (Monitoring Report)**

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis (describe and cite): [The visible emissions from any air pollution source that emits, or could emit, particulate matter or other visible air pollutants shall not exceed 20% opacity, averaged over any consecutive six-minute period. \[AOP #R10T5020100, Conditions 3.9, 3.10, 3.11\]](#)

Emission Units (Unit IDs): Facility Wide

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): [Once each calendar year, during typical operating conditions and meteorological conditions conducive to producing fugitive dust, the permittee shall survey the facility to determine the sources of fugitive particulate matter emissions. \[AOP #R10T5020100, Condition 3.13\]](#)

Emission Units (Unit IDs): Facility Wide

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): [The permittee shall keep records showing that only wood is combusted in the boiler. \[AOP #R10T5020100, Condition 4.4\]](#)

Emission Units (Unit IDs): EU-1

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): [The permittee shall obtain, record, and keep records of the percent sulfur by weight from the vendor for each delivery of liquid fuel. \[AOP #R10T5020100, Condition 4.5\]](#)

Emission Units (Unit IDs): Facility-Wide

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): [Once each quarter, the permittee shall visually survey each emission unit and any other pollutant emitting activity for the presence of visible emissions or fugitive emissions of particulate matter. \[AOP #R10T5020100, Condition 4.6\]](#)

Emission Units (Unit IDs): Facility-Wide

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_



SIXMON

<p>Monitoring, Data, or Analysis (describe and cite): <a href="#">The permittee shall obtain, record, and keep records of the percent (by weight) chloride in the used oil for each batch of fuel. [AOP #R10T5020100, Condition 4.16]</a></p> <p>Emission Units (Unit IDs): EU-5</p> <p>Separate Report? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      Date <input type="text"/>/ <input type="text"/>/ <input type="text"/>      Attachment ID <input type="text"/></p>
<p>Monitoring, Data, or Analysis (describe and cite): <a href="#">Each month, the permittee shall calculate and record facility-wide monthly and rolling 12-month total emissions (tons) for all HAP-emitting activities at the facility. [AOP #R10T5020100, Condition 4.17]</a></p> <p>Emission Units (Unit IDs): Facility-Wide</p> <p>Separate Report? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      Date <input type="text"/>/ <input type="text"/>/ <input type="text"/>      Attachment ID <input type="text"/></p>
<p>Monitoring, Data, or Analysis (describe and cite): <a href="#">The permittee shall track and record the operations and production for each HAP-emitting activity at the facility, such that facility-wide HAP emissions can be calculated on a monthly and 12-month basis. [AOP #R10NT501000, Condition 4.19]</a></p> <p>Emission Units (Unit IDs): Facility-Wide</p> <p>Separate Report? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      Date <input type="text"/>/ <input type="text"/>/ <input type="text"/>      Attachment ID <input type="text"/></p>
<p>Monitoring, Data, or Analysis (describe and cite): <a href="#">The permittee shall maintain records of emission calculations and parameters used to calculate emissions for at least five years. [AOP #R10NT501000, Condition 4.20]</a></p> <p>Emission Units (Unit IDs): Facility-Wide</p> <p>Separate Report? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      Date <input type="text"/>/ <input type="text"/>/ <input type="text"/>      Attachment ID <input type="text"/></p>
<p>Monitoring, Data, or Analysis (describe and cite): <a href="#">NESHAP Subpart JJJJJJ Boiler EU-1 Performance Tune-up. The permittee shall conduct a performance tune-up of boiler EU-1 no later than March 21, 2014, and every 2 years thereafter. [AOP #R10NT501000, Condition 4.22]</a></p> <p>Emission Units (Unit IDs): EU-1</p> <p>Separate Report? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      Date <input type="text"/>/ <input type="text"/>/ <input type="text"/>      Attachment ID <input type="text"/></p>
<p>Monitoring, Data, or Analysis (describe and cite): <a href="#">NESHAP Subpart JJJJJJ Energy Assessment for Boiler EU-1 and Its Energy Use Systems. The permittee shall have a one-time energy assessment performed or amended on or after January 1, 2008. [AOP #R10NT501000, Condition 4.23]</a></p> <p>Emission Units (Unit IDs): EU-1</p> <p>Separate Report? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      Date <input type="text"/>/ <input type="text"/>/ <input type="text"/>      Attachment ID <input type="text"/></p>

Monitoring, Data, or Analysis (describe and cite): NESHAP Subpart JJJJJ Boiler EU-1 General Duty Requirement. At all times, the permittee must operate and maintain boiler EU-1, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [AOP #R10NT501000, Condition 4.24]

Emission Units (Unit IDs): EU-1

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): NESHAP Subpart JJJJJ Boiler EU-1 Performance Tune-up Monitoring. The permittee shall measure and record the concentration of CO in parts per million, by volume, and O2 in volume percent, in boiler EU-1's effluent stream before and after the performance tune-up. [AOP #R10NT501000, Condition 4.26]

Emission Units (Unit IDs): EU-1

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): NESHAP Subpart JJJJJ Boiler EU-1 Performance Tune-up Reporting. Maintain on-site and submit to EPA as part of the semiannual report satisfying Condition 3.47 the information for each performance tune-up conducted to satisfy Condition 4.22:. [AOP #R10T5020100, Condition 4.30]

Emission Units (Unit IDs): EU-1

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): Periodic Particulate matter Test. The permittee shall measure particulate matter emissions from the boiler stack. [AOP #R10NT501000, Conditions 5.5 and 5.6]

Emission Units (Unit IDs): EU-1

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): Carbon Monoxide and Nitrogen Oxides Test. Within 180 days after issuance of this permit, the permittee shall measure carbon monoxide and nitrogen oxides emissions from the boiler stack. [AOP #R10NT501000, Condition 5.7]

Emission Units (Unit IDs): EU-1

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): Periodic Visible Emission Monitoring. The permittee shall measure visible emissions from the boiler stack within three months after this permit is issued for one hour. [AOP #R10NT501000, Condition 5.8]

Emission Units (Unit IDs): EU-1

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_



Monitoring, Data, or Analysis (describe and cite): The permittee shall install, calibrate, operate and maintain equipment necessary to measure and record steam production, steam pressure, boiler excess oxygen downstream of the combustion chamber, pressure drop across the multiclone, pressure drop across the scrubber, and water flow to the scrubber. [AOP #R10NT501000, Condition 5.9]

Emission Units (Unit IDs): EU-1

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): The permittee shall sample and analyze the wood fuel for chloride content no less frequently than quarterly to determine a hydrogen chloride emission factor (lb/MMBtu). [AOP #R10NT501000, Condition 5.15]

Emission Units (Unit IDs): EU-1

Separate Report? ☒ Yes \_\_\_ No Date 7/29/2020 & 1/14/2021 Attachment ID PL-01

Monitoring, Data, or Analysis (describe and cite): The permittee shall determine the monthly volume of lumber dried (bf/month) in the lumber kilns according to species of lumber and maximum drying temperature of each batch. [AOP #R10NT501000, Condition 6.2]

Emission Units (Unit IDs): EU-2

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): The first time each calendar year that the used oil-fired heater is operated for 4 or more consecutive daylight hours, the permittee shall conduct a visible emissions observation of the heater stack, for one hour. [AOP #R10T5020100, Condition 9.3]

Emission Units (Unit IDs): EU-5

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

Monitoring, Data, or Analysis (describe and cite): The permittee shall record the number of hours that the heater operates. [AOP #R10T5020100, Condition 9.4]

Emission Units (Unit IDs): EU-5

Separate Report? \_\_\_ Yes ☒ No Date \_\_\_/\_\_\_/\_\_\_ Attachment ID \_\_\_\_\_

**Section D (Deviations Reported Semiannually)**

This section is for deviations reported for the first time in this six-month monitoring report. Describe and cross-reference the permit terms and emission units that apply to the deviation. Copy this page as many times as necessary to include all such deviations. Report the beginning and ending times (mo/day/yr, hr:min) for each deviation. Use the 24-hour clock. Briefly explain (if known) the probable cause of each deviation. If any corrective actions or preventative measures have been taken to avoid these in the future, briefly describe the measures, including when they occurred.

**Permit Term (for Which There is a Deviation):**

The NESHAP Subpart JJJJJ Boiler EU-1 tune-up results were not submitted with the 1H 2020 Semi-Annual Monitoring report due August 14, 2020. [AOP #R10T5020100, Condition 4.30]

Corrective Action Taken: Tune-up results are included in this revised 2H 2020 Semi-Annual Monitoring report, submitted March 1, 2021.

A tune-up was performed on boiler EU-1 March 25, 2020. The concentration of CO in boiler's effluent stream was 821 ppm at 7.2% O<sub>2</sub> prior to the tune-up and 328 ppm at 8.7% O<sub>2</sub> after.

No corrective actions were required as a result of the tune-up.

An **excursion** is defined as scrubber pressure drop less than 3.0 inches of water, or scrubber water flow rate less than 30 gallons per minute [AOP #R10T5020100, Condition 5.10.5]

**Emission Units (unit IDs): EU-1**

Deviation Start:	<u>07/1/2020</u>	<u>16:30</u>	End:	<u>07/1/2020</u>	<u>18:30</u>	2	hours
Deviation Start:	<u>07/1/2020</u>	<u>20:30</u>	End:	<u>07/1/2020</u>	<u>21:30</u>	1	hour
Deviation Start:	<u>07/2/2020</u>	<u>17:30</u>	End:	<u>07/2/2020</u>	<u>18:30</u>	1	hour
Deviation Start:	<u>08/17/2020</u>	<u>20:30</u>	End:	<u>08/19/2020</u>	<u>14:30</u>	42	hours
Deviation Start:	<u>08/20/2020</u>	<u>1:30</u>	End:	<u>08/20/2020</u>	<u>11:30</u>	10	hours
Deviation Start:	<u>08/31/2020</u>	<u>14:30</u>	End:	<u>08/31/2020</u>	<u>17:30</u>	3	hours
Deviation Start:	<u>09/1/2020</u>	<u>23:30</u>	End:	<u>09/2/2020</u>	<u>1:30</u>	2	hours
Deviation Start:	<u>10/26/2020</u>	<u>9:30</u>	End:	<u>10/26/2020</u>	<u>10:30</u>	1	hour
Deviation Start:	<u>12/14/2020</u>	<u>13:30</u>	End:	<u>12/14/2020</u>	<u>16:30</u>	3	hours

**TOTAL 65 hours**

Probable Cause of Deviation: Low scrubber flow and or pressure drop can occur when the scrubber is plugged or needs repair. In addition, some incidents are due to startup when stack flows are still too low to produce 3" of pressure drop. A new control system was installed 8/6/2020-8/17/2020. Low pressure drops occurred upon startup and while learning to operate the new control system.

Corrective Actions or Preventative Measures Taken: When the scrubber pressure drop or water flow rate is too low across multiple readings, operators inspect scrubber for scale buildup or broken parts and shut down boiler and scrubber to perform appropriate maintenance. For startup, check and continue to full operation. Boiler operators were trained to effectively use the new control system.





OMB No. 2060-0336, Expires 11/30/2022

Federal Operating Permit Program (40 CFR Part 71)  
**CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)**

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

**A. Responsible Official**Name: (Last) Crider (First) Kevin (MI) \_\_\_\_\_Title Plant ManagerStreet or P.O. Box P.O. Box 639City Plummer State ID ZIP 83851 - 0639Telephone (208) 686 - 9080 Ext. \_\_\_\_\_ Facsimile (\_\_\_\_) \_\_\_\_ - \_\_\_\_\_**B. Certification of Truth, Accuracy and Completeness** (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Name (typed) Kevin Crider Date: 3 / 1 / 2021